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July 15, 2021

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Hayes, et al., No. 20 Cr. 500 (JGK)*

Dear Judge Koeltl:

We represent Defendant Samuel Reed and respectfully submit this letter on behalf of Mr. Reed and Defendants Arthur Hayes and Benjamin Delo, whose counsel are copied on this letter.

Pursuant to the conference with the Court on May 11, 2021 and the Court's order of May 11, 2021, ECF No. 71, Defendants will be submitting their reply memorandum of law, declaration, and exhibits in further support of their motions to compel production, ECF Nos. 86, 87, tomorrow, July 16, 2021. The reply memorandum and supporting materials will be delivered to Chambers in both hard copy and electronic form.

Having conferred with the government pursuant to Your Honor's Individual Practices Rule IV.A.2, we respectfully seek leave from the Court to file these papers under seal at the present time because the reply memorandum, declaration, and exhibits each include materials the government has designated "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case. ECF Nos. 23, 41, 55. The parties will confer on proposed redactions.

We are available at the Court's convenience to discuss any questions. Thank you.

APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

Respectfully submitted,

/s/ Douglas K. Yatter

Douglas K. Yatter
Benjamin Naftalis
of LATHAM & WATKINS LLP

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cc: James J. Benjamin, Jr. (counsel for Arthur Hayes)
Patrick J. Smith (counsel for Benjamin Delo)
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All Counsel of Record (via ECF)